RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Hukill Chemical Corp.

U.S. EPA ID No.: OHD 001 926 740

Street: 7013 Krick Rd

City: Bedford State: OH Zip: 44146

Telephone: (216) 232-9400

Inspection Date: 12/17/90 Time: ________ (am/pm)

Weather Conditions: Cloudy + cool

	Name	Agency/Title	Telephone
Inspectors:	Paul Anderson	Ohio EPA, Env Sup.	(216) 425-9171
	Kristen Switzer	Ohio EPA, EE II	"
Facility Representatives:			

See Appendix B to determine which of the following LDR waste categories the facility manages:

	Generate	Transport	Treat	Store	Dispose
F001-F005 Solvents	✓	✓		✓	
F020-F023 and F026-F028					
California List*	✓	✓		✓	
First Third [40 CFR 268.10]	✓	✓		✓	
Second Third [40 CFR 268.11]	✓	✓		✓	
Third Third [40 CFR 268.12]	✓	✓		✓	

Ni, Thalium, Hg and As containing liquid ing wastes

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

Hukill Chemical is a hazardous waste fuel marketer and solvent recycling, acid recycling facility. Wastes are received in drums or in bulk (tanker trucks) and are stored in tanks (all acids) or containers in permitted storage tanks and a permitted drum storage area. Acids are regenerated for sale as a product. Solvents are either reclaimed through distillation or are blended into hazardous waste fuels. Still bottoms, light solvents and non-reclaimable solvents wastes are blended into fuels.

Hukill may also broker wastes through the permitted storage units for disposal via incineration (wastes which can not be processed into fuels).

Facility also generates solvent contaminated water which is shipped off site for treatment.

LDR Waste Management:

LDR wastes are processed as described above. All non-fuel type wastes are stored in drums prior to off site treatment.

No wastes are shipped to land disposal facilities.

Summary: F001, F002, F003, F005, D006, D008 wastes sold as hazardous waste fuels are being incorrectly identified on hazardous waste manifests and LDR notifications by not identifying the EPA F001, F002 waste codes. In addition, fuels blends may from time to time include treatment residues (still bottoms) from the treatment of U-listed or K088 wastes. The facility must take steps to ensure that fuels are properly classified

One LDR notification was not found in facility files

Signature:

Paul Anderson

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:
   F001 - F005

2. F020-F023 and F026-F028 dioxin-containing wastes:
   NA

3. California List Wastes (See Appendix A):
   F001 - F005, D001 may have metals Ni, Thalium and/or Hg

4. First Third Wastes [40 CFR 268.10]:
   K086, U019, U031, U037, U154, U159, U220, U226

5. Second Third Wastes [40 CFR 268.11]:
   U002, U030, U140, U161, U213, U239

6. Third Third Wastes [40 CFR 268.12]**:
   D001, D002, D004, D005, D006, D007, D008, D009, D010, D011, D012, D013
   D014, D015, D016, D017, U052, U112

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic [55 FR 22531].

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?*

   Yes___ No ✓

   Listed wastes F001, F002, F003, F005, D006, D008 generated have been misclassified as only F003, F005 (D006, D008) Still bottoms are also derived from chlorinated solvents and fuel shipments must be properly classified

   If no, list below:

Assigned Classification	Correct Classification
F003, F005, D006, D008	F001, F002, F003, F005, D006, D008

*Areas of concern include: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and K wastes; and waste code carry through principle.

Comments: See above - Note: facility also manages F004 and K and U listed wastes. Still bottoms must be properly classified

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ✓ No ___ NA ___

Comments Currently identified as F003, F005, D001, D008

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ___ No ___ NA ✓

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ___ No ___

Comments _____

C. **Does the facility handle the following wastes (national capacity variances)?**

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ___ No ✓ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ___ No ✓ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ___ No ✓ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35 (b)]

Yes ___ No ✓ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ___ No ✓ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A; (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ___ No ✓ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refactory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ___ No ✓ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ___ No ✓ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
F001, F003/F005	___	✓
___	___	___
___	___	___

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCWE. [40 CFR 268.2(f)(1)]

Comments See page 1 of general info, incorrectly identifying still bottoms shipped off site

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ✓

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
___	___	___
___	___	___
___	___	___

Comments ___

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ✓ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code	Subcategory	Wastewater*	Nonwastewater
D006, D007 F001, F002, F003, F005			✓
D001		✓	

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments See waste identification section for waste codes

b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ___ No ✓ NA ___ waste may also be TC for Cd and Pb.

c. Does the generator specify alternative treatment standards for lab packs?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes?* [40 CFR 268.42(c)(2)]

___ Organometallics: 40 Part 268, Appendix IV constituents
___ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ___ No ___ NA ✓

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

a. Liquid hazardous wastes containing PCBs ≥50 ppm

Yes ___ No ___ NA ✓

If yes, check the appropriate treatability group:

___ 50 to 500 ppm PCBs
___ ≥500 ppm PCBs

b. Listed or characteristic wastes containing ≥1,000 mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ✓ NA ___

If yes, check the appropriate treatability group:

___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥130 mg/l thallium

Yes ✓ No ___ NA ___ dependant upon wastes which are being processed

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ✓

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ✓

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	___	__/__/__
___	___	__/__/__
___	___	__/__/__

Comments ___

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ✓ NA ___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	___	___	___
___	___	___	___
___	___	___	___

Comments ___

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ___ No _✓_

If yes, did the generator select the most stringent treatment standards? [40 CFR 268.41(b) and 268.43(b)]

Yes ___ No ___

Comments ______________________________

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes _✓_ No ___ based on knowledge

*Note: This determination may be made at the point of disposal if the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ___ No ___

Comments ______________________________

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

a. Knowledge of waste:

Yes _✓_ No ___

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]
F001, F002, F003, F005 • also D006, D008. Basis is knowledge of waste fed into distillation [illegible] process.
Documentation consist of preshipment and confirmation analyses.

b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP?** (BDAT*** = stabilization/immobilization technology)

Yes ___ No _✓_ NA ___

*TCLP = Toxicity Characteristic Leaching Procedure [40 CFR Part 268, Appendix I, EPA Test Method 1311)
**See Appendix C for exceptions.
***BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ___ No ___ NA ___

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ___ No ✓ NA ___

*PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7 (a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ___ No ✓ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ___ No ___

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ___ No ___ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

___ Based on a detailed chemical and physical analysis of a representative sample
___ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ___ No ___

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments _____

b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ✓ (If No, go to c.)

Check appropriate category:

___ Dilutes to meet treatment standards
___ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___ Managed in treatment systems regulated under the Clean Water Act
___ Non-toxic* characteristic wastes
___ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001(except high TOC nonwastewaters), D002, and D003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ✓

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ___ No ___ NA ✓

C. **Management**

1. On-Site Management

a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ✓ No ___

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments Permit for tank + container storage

b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ✓ No ___ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
D001, D008, F001, F002, F003, F005	Systech - 3 facilities: Greenseattle, Alpena, Paulding
"	Petrochem
"	Solidtek

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

However, see below

Yes ✓ No ___ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ✓

b. Is a notification sent with each waste shipment?

Yes ___ No ✓ Shipment on manifest #1407, (F002, F003, F005) on 8-16-90 not accompanied with an LDR Notification

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ✓ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	___
___	___
___	___

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ___ No ___ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
___	___
___	___
___	___

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to d.)

b. Are a notification and a certification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 4.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ___ No ___

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ___ No ✓ (If No, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ___ No ___

b. Is a notification sent with each waste shipment?

Yes ___ No ___

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ___ No ___ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
___	_____
___	_____
___	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ___ No ___

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ✓ No ___

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ___ No ___ NA ✓

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ✓ No ___ NA ___

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments D002, other california list

D. **Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes**

1. Are restricted wastes treated in RCRA exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ✓ No ___ (If No, do not complete this section.)

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units and Processes
D001	Distillation	~~Still~~ Distillation followed by fuels blending
F001/F002	"	"
F003/F005	"	"

other U codes

2. Are treatment residuals generated from these units?

Yes ✓ No ___

Comments Still bottoms blended into fuels or sold to other marketers.

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes ✓ No ___ NA ___ may be stored on site in permitted tanks and containers

(If yes, the TSD checklist must also be completed.)

E. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

Facility must take measures to ensure that shipments of hazardous waste fuel are properly coded on the waste manifests and notification. All appropriate F and U codes must be listed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

IV. TSD REQUIREMENTS

A. Waste Analysis [40 CFR 268.7(b), 264.13, and 265.13]

1. Does the waste analysis plan address the following LDR waste categories? [40 CFR 264.13(b)(6) and 265.13(b)(6)]

F001-F005 Spent Solvents	Yes ___	No ___	NA ___
F020-F023 and F026-F028 Dioxins	Yes ___	No ___	NA ___
California List Wastes	Yes ___	No ___	NA ___
First, Second, and Third Third Wastes	Yes ___	No ___	NA ___

Comments_____

2. Has the waste analysis plan been revised to address F039 multi-source leachate?

Yes ___ No ___ NA ✓

3. What date was the waste analysis plan last revised? 7/1/90

4. Does analytical data contain all the information required to treat, store, or dispose of restricted wastes? [40 CFR 264.13(a)(1) and 265.13(a)(1)]

Yes ✓ No ___

If yes, which of the following are sources of analytical data? (More than one may apply.):

✓ Generator provides data
✓ Facility performs analyses in on-site laboratory
___ Facility contracts analyses at off-site laboratory

If the generator provides data, does the facility provide corroborative testing? [40 CFR 264.13(a)(2) and 265.13(a)(2)]

Yes ✓ No ___ NA ___

If analyses are conducted off site, identify lab:_____

a. Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using the toxicity characteristic leaching procedure (TCLP)?* (BDAT** = stabilization/immobilization technology) [40 CFR 268.7(b)(1)]

Yes ___ No ✓ NA ___

*See Appendix C for exceptions.
**BDAT = best demonstrated available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

b. Are wastes with treatment standards specified in 40 CFR 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology) [40 CFR 268.7(b)(3)]

K086 has not been received for a period of time. Currently not an active waste stream

Yes ___ No ___ NA ✓

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, frequency of testing, and note any problems. Attach test results. [40 CFR 264.73 (b)(3) and 265.73(b)(3)]

c. Is the paint filter liquids test (PFLT) used to determine if California List wastes are contained in *liquid* hazardous waste? [40 CFR 268.32(i)]

Yes ___ No ✓ NA ___

If yes, list the wastes for which PELT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 264.73(b)(3) and 265.73(b)(3)]

B. **Operating Record [40 CFR 264.73 and 265.73]**

1. Does the operating record contain records and results of waste analyses performed as specified in 40 CFR 268.4 and/or 40 CFR 268.7(b)? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

Yes ✓ No ___

2. Does the operating record contain copies of LDR notifications and certifications?* [40 CFR 264.73(b)(11), (13), and (15) and 40 CFR 265.73(b)(11), (13), and (15)]

Yes ✓ No ___

*Include both those received from generators, and those prepared for off-site shipments.

3. Does the operating record include appropriate documentation for restricted wastes which are managed wholly on site? [40 CFR 264.73(b)(12), (14), and (16) and 265.73(b)(12), (14), and (16)]

Yes ___ No ___ NA ✓

Does the documentation discussed in points 2. and 3. reflect proper historical management of wastes previously covered under expired national capacity variances, case by case extensions, and the soft hammer provision?*

Yes ✓ No ___ NA ___

*Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

C. Storage [40 CFR 268.50]

1. Are prohibited* wastes stored on site in containers?

Yes ✓ No ___ (If No, go to 2.)

*See Appendix E for distinction between restricted and prohibited wastes.

Are all containers clearly marked to identify the contents and date(s) entering storage? [40 CFR 268.50(a)(2)(i)]

Yes ___ No ___

Have wastes been stored for more than one year since the applicable LDR regulations went into effect?

Yes ___ No ___ (If No, go to 2.)

Can the facility show that such accumulation is necessary to facilitate property recovery, treatment, or disposal? [40 CFR 268.50 (c)]

Yes ___ No ___

If yes, state how:_____

2. Are prohibited wastes stored on site in tanks?

Yes ✓ No ___ (If No, go to 3.)

Are all tanks clearly marked with a description of the contents, the quantity of each hazardous waste received, and date each period of accumulation begins, or is such information recorded and maintained in the operating record? [40 CFR 268.50(a)(2)(ii)]

Yes ✓ No ___

Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes ✓ No ___ (If Yes, go to 3.)

Can the facility show that such accumulation is neccesary to facilitate proper recovery, t atment, or disposal? [40 CFR 268.50(c)]

Yes ___ No ___

If yes, state how:_____

3. Does the facility store liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm?

Yes ___ No ✓ (If No, go to D.)

Does the facility meet the TSCA criteria in 40 CFR 761.65(b)? [40 CFR 268.50(f)]

Yes ___ No ___

Have these wastes been stored for more than one year? [40 CFR 268.50(f)]

Yes ___ No ___

D. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

Yes ___ No ✓ (If No, do not complete this section. Go to E.)

2. Are required technologies used to treat wastes which have treatment standards specified in 40 CFR 268.42? [40 CFR 268.40(b)]

Yes___ No___ NA___ (If Yes or NA, go to 3.)

Was an alternative method approved?

Yes___ No___

List each waste code, the technology specified in 40 CFR 268.42, and the alternative method. Check if approval of the alternative method is documented. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval

3. Lab packs: If alternative treatment standards are specified, are incinerator residues from lab packs containing D004, D005. D006, D007, D008, D010, and D011 treated in compliance with the subpart D treatment standards for these characteristic wastes? [40 CFR 268.42(c)(4)]

Yes___ No___ NA___

4. Describe all other waste codes and treatment processes:

Waste Code	Treatment Processes
_____	_____
_____	_____
_____	_____

5. Characteristic wastes:

Is the 40 CFR Part 268 treatment standard lower than the 40 CFR Part 261 characteristic level?*

Yes ___ No ___

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

If yes, does the facility manage the waste as restricted until 40 CFR Part 268 treatment standards are met, even after the waste is rendered non-hazardous? [40 CFR 268.9(d)]

Yes ___ No ___

Comments_____

6. Dilution Prohibition [40 CFR 268.3]:

a. Does the facility mix prohibited wastes with different treatment standards?

Yes ___ No ___ (If No, go to c.)

List the wastes_____

b. Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

If yes, is this method used for the aggregated wastes?

Yes ___ No ___

Comments_____

c. Based on an assessment of points a. and b., or any other relevant information, is dilution used as a substitute for treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

7. Does the facility, in accordance with an acceptable waste analysis plan, test residues from all treatment processes? [40 CFR 268.7(b)]

Yes ___ No ___

Comments _____

8. Does the facility ship any characteristic wastes which have been rendered non-hazardous to a Subtitle D facility?

Yes ___ No ___ (If No, go to 9.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes ___ No ___

9. Does the facility ship any wastes or treatment residues to an off-site land disposal facility?

Yes ___ No ___ (If No, go to 10.)

Complete the following table:

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are a notification and a certification provided to the land disposal facility with each waste shipment? [40 CFR 268.7(b)(4) and 40 CFR 268.7(b)(5)]

Yes ___ No ___

10. Does the facility ship any wastes or treatment residues to be further managed at a different treatment or storage facility?

Yes ___ No ___ (If No, go to E.)

Complete the following table:

Waste Code	Receiving Facility
____	_____
____	_____
____	_____

Are appropriate generator notifications and certifications provided to the receiving facility with each waste shipment? [40 CFR 268.7(b)(6)]

Yes ___ No ___

E. Surface Impoundments [40 CFR 268.4]

1. Are restricted wastes placed in surface impoundments for treatment?

   Yes ___ No ✓ (If No, go to F.)

   List _____

2. Are evaporation or dilution the only recognizable treatment occurring in the surface impoundment? [40 CFR 268.3(a) and 268.4(b)]

   Yes ___ No ___

   Comments _____

3. Has the facility submitted to the Agency a waste analysis plan and certification of compliance with minimum technology requirements and ground-water monitoring requirements? [40 CFR 268.4(a)(4)]

   Yes ___ No ___

4. If the minimum technology requirements have not been met, has a waiver been granted for that unit? [40 CFR 268.4(a)(3)(ii)]

   Yes ___ No ___ NA ___

5. Are representative samples of sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analyses specified in the waste analysis plan? (Attach test results.) [40 CFR 268.4(a)(2)(i)]

   Yes ___ No ___

6. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.4? [40 CFR 264.73(b)(3) and 265.73(b)(3)]

   Yes ___ No ___

   Comments _____

7. Do the treatment residues (sludges or liquids) exceed applicable treatment standards/prohibition levels?

Sludge Yes ___ No ___ Waste Code _____
Supernatant Yes ___ No ___ Waste Code _____

Provide the frequency of analyses conducted on treatment residues:

_____

8. If sludge residues exceed treatment standards/prohibition levels, are they removed on an annual basis? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments _____

Are residues subsequently managed in another surface impoundment? [40 CFR 268.4(a)(2)(iii)]

Yes ___ No ___

9. If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume? [40 CFR 268.4(a)(2)(ii)]

Yes ___ No ___ NA___

Comments_____

F. **Land Disposal**

1. Are restricted wastes placed in or on the land in units such as landfills, surface impoundments*, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers? [40 CFR 268.2(c)]

Yes ___ No ✓ (If No, go to G.)

*Note: Do not include surface impoundments addressed in E.

If yes, specify which units and what wastes each unit has received:

Unit	Waste
_____	_____
_____	_____
_____	_____

2. Does the facility, in accordance with an acceptable waste analysis plan, test prohibited wastes prior to land disposal to ensure that all applicable treatment standards and/or prohibition levels have been met? [40 CFR 268.7(c)(2)]

Yes ___ No ___

Comments_____

3. Does the facility test wastes to ensure that they do not exhibit any characteristics at the point of disposal?* [40 CFR 268.9(c)]

Yes ___ No ___ NA___

*Note: A waste may exceed a characteristic level only if the treatment standard for that characteristic has been met.

4. Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268.7(c)? [40 CFR 264.73(b)(3) and 265.73(b)(3)

Yes ___ No ___

If yes, at what frequency are analyses performed?_____

_____

5. Does the facility land dispose of restricted wastes which are not prohibited?

Yes ___ No ___ (If No, go to 6.)

List waste codes in appropriate category below:

National Capacity Variance (40 CFR Part 268, Subpart C)_____
Case-By-Case Extension (40 CFR 268.5)_____
No-Migration Petition (40 CFR 268.6)_____
Treatment Standard Variance (40 CFR 268.44)_____

Does the operating record contain records of the quantities, date of placement, and a copy of the generator notification [40 CFR 268.7(a)(3)] for each shipment of restricted waste subject to a case-by case extension or no-migration petition? [40 CFR 264.73(b)(10) and 265.73(b)(10)]

Yes ___ No ___ NA ___

Do land disposal units receiving wastes covered by a national capacity variance or case-by-case extension meet the requirements in 40 CFR 268.5(h)(2)?

Yes ___ No ___ NA ___

If the facility has a case-by-case extension, is progress being made as described in reports to the Regional Administrator?

Yes ___ No ___ NA ___

6. Are restricted wastes placed in underground injection wells?

Yes ___ No ___ List _____

G. Other Wastestreams

1. Does the facility generate wastes other than residues from RCRA treatment units?

Yes ✓ No ___ (If No, go to H.) site water

2. On-Site Management

a. If characteristic wastes are treated in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ___ No ___ NA ✓

b. If characteristic wastes are treated in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ___ No ___ NA ✓

*This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

3. Off-Site Management: Waste Exceeds Treatment Standards

Are wastes that exceed treatment standards/prohibition levels (not subject to a national capacity variance) shipped to an off-site treatment or storage facility?

Yes ___ No ___ (If No, go to 4.)

Identify wastes code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code	Receiving Facility
___	_____
___	_____
___	_____

Are LDR notifications provided for each shipment to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ___ No ___ (If No, go to 4.)

If alternative treatment standards are specified for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ___ No ___ NA ___

4. Off-Site Management: Wastes Meets Treatment Standards

a. Are wastes that meet treatment standards/prohibition levels shipped to an off-site disposal facility?

Yes ___ No ✓ (If No, go to 5.)

Identify waste code(s) and off-site disposal facilities:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are LDR notifications and certifications provided for each shipment to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ___ No ___ (If No, go to b.)

b. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ___ No ___ NA ___ (If No or NA, go to 5.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) amd 268.7(b)(5)?

Yes ___ No ___

Do wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

___Managed in treatment systems regulated under the Clean Water Act
___Non-toxic* characteristic wastes
___Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

_____
_____
_____

c. Based on an assessment of points a. and b., and any other relevant circumstances, are prohibited wastes diluted as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ___ No ___

Comments_____

H. **Additional Comments, Concerns, or Issues Not Addressed in the Checklist:**

_____
_____
_____
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5. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

a. Are wastes that are subject to a national capacity variance (40 CFR Part 268, Subpart C) or a case-by-case extension (40 CFR 268.5) shipped to a treatment, storage, or disposal facility?

Yes ___ No ✓ (If No, go to 6.)

Complete the following table:

Waste Code	Receiving Facility
_____	_____
_____	_____
_____	_____

b. Are LDR notifications (stating that the waste is not prohibited from land disposal) provided for each shipment to the off-site receiving facility? [40 CFR 268.7(a)(3)]

Yes ___ No ___

6. Dilution Prohibition [40 CFR 268.3]:

a. Are prohibited* wastes with different treatment standards mixed?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ___ No ✓ (If No, go to b.)

List the wastes_____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ___ No ___

Comments_____

b. Are prohibited wastes diluted to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ___ No ___ (If No, go to c.)

Check appropriate category:

___Dilutes to meet treatment standards
___Dilutes to render waste non-hazardous

LAND DISPOSAL RESTRICTIONS INSPECTION

V. TRANSPORTER REQUIREMENTS

A. **Does the transporter accumulate restricted wastes for more than 10 days? [40 CFR 268.50(a)(3)]**

Yes ___ No ✓

If yes, check the appropriate regulatory status:

___ Interim status for storage
___ RCRA permit for storage

(The TSD checklist must also be completed.)

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

_____
_____
_____

B. **Does the transporter mix or combine restricted wastes of different DOT shipping descriptions? [40 CFR 263.10(c)(2)]?**

Yes ___ No ✓

(If yes, the Generator checklist must also be completed.)

_____
_____
_____

C. **Are restricted wastes treated in RCRA exempt units (boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?**

Yes ___ No ✓ (If No, do not complete this section.) first placed into permitted storage unit

List types of waste treatment units and processes:

Waste Code	Type of Treatment	Treatment Units or Process
_____	_____	_____
_____	_____	_____
_____	_____	_____

Are treatment residuals generated from these units?

Yes ___ No ___

Comments_____

Are residuals further treated, stored for greater than 10 days, or disposed on site?

Yes ___ No ___ NA ___

(If Yes, the TSD checklist must also be completed.)

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: Hukill Chemical Corp
Address: 7013 Krick Rd
Bedford, Ohio 44146
County: Cuyahoga

Date of Inspection 11-14-89, 11-15-89
HWFB #: 02-18-0315
USEPA ID #: OHD 001 926 740
Facility Phone #: (216) 232-9400

Facility Contact:
Facility Contact Phone # (216) 232-9400
Safety Equipment #:

Inspector(s)Name(s): Paul Anderson

STATUS
Cond. Ex. SQG___ SQG___ Generator ✓ Transporter ✓ Treatment___ Storage ✓ Disposal___

ACTIVITIES
Containers ✓ Tanks ✓ Surface Impoundments___ Incineration/Thermal treatment___
Waste pile___ Land treatment___ Landfill___ Groundwater monitoring___
Used oil burner___ Hazardous waste fuel burner/blender ✓

	Y/N/NA	REMARK #
1. Does the facility produce "discarded materials" as defined in 3745-51-02(A)?	Y	
2. Are they :		
a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)?	Y	
b.Recycled?	Y	
c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?	N	
3. If recycled or accumulated, treated or stored before recycling, is the waste:		
a. Used in a manner constituting disposal?	Y	
b. Burned for energy recovery?	N	marketed as waste fuel
c. Reclaimed? (Refer to Table 1 of 3745-51-02)	Y	
d. Accumulated speculatively?	N	
4. Is the material recycled by being:		
a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?	N	
b. Used as an effective substitute for commercial products?	N	
c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?	N	

	Y/N/NA	REMARK #
Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	Y	
6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	Y	
7. If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?	N	New tank farm not on Part A in operation outstanding from April 1989
8. If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.	Y	March 31, 1989 - in process
9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?	Y	
10. Has the facility submitted a Part B?	Y	
11. Was advance notice of the inspection given? If so, how far in advance?	N	

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

Hukill Chemical is a solvent recycler and hazardous waste fuel marketer.

Permitted hazardous waste units include tanks and container storage. Bulk and drumed wastes are transported to the site primarily by Hukills own vehicles and are either reclaimed via fractionation/distillation, blended into hazardous waste fuels or transported on for treatment at other permitted facilities.

OAC 3745-52 GENERATOR REQUIREMENTS (40 CFR Part 262)	Y/N/NA	REMARKS
1. Have the wastes generated at this facility been evaluated as required under 3745-52-11 (262.11)?	Y	
2. Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?	N	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit [3745-65-01] (265.1(c)(10))?	Y	Distillation units
4. Is the generator classified as a Small Quantity Generator (SQG) or conditionally exempt SQG? If so, complete appropriate checklist.	N	
5. Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:		
a. All hazardous wastes shipped off-site have been accompanied by a completed manifest using the most recently revised USEPA form 8700-22?	Y	
b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number of copies required by 3745-52-22 (262.22)?	Y	
c. The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with 3745-52-20(C)(D)(E) (262.20)?	Y	
d. Prepared manifests have been signed by the generator and initial transporter in compliance with 3745-52-23(A)(1&2) (262.23)?	Y	
e. The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))?	NA	
f. Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?	Y	

		Y/N/NA	REMARKS
	Does the generator meet the following hazardous waste pre-transport requirements:	Y	
a.	Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?	Y	
b.	Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?	Y	
c.	Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?	Y	
7.	Does the generator import or export hazardous waste?	N	
	If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	NA	
8.	If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
a.	The containers or tanks are clearly marked with the words "Hazardous Waste"?	N	Tank V 1500C must be labelled
b.	The date that accumulation began is clearly marked on each container?	Y	
c.	If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete Management of Containers checklist.	Y	

REMARK #		YES/NA	REMARK #
See Subpart I checksheet	enerator provide a Personnel Training Program in with 3745-65-15(A)(3)(C) (265.16) including instruction uipment operation and emergency procedures, training ees within 6 months and providing an annual training fresher course? [3745-52-34(A)(4)] (262.34)	Y	
	enerator keep all of the records required by (D)(E) (265.16) including written job titles, job ns and documented employee training records? 4(A)(4)] (262.34)	Y	
	nerator filed annual reports on or before March 1st t calendar year as required by 3745-52-41?	Y	
	enerator comply with the applicable requirements for operators of hazardous waste facilities? Complete ess and Prevention" and "Contingency Plan and Emergency " checklists.	Y	

REMARKS, GENERATOR REQUIREMENTS

Except in permitted drum storage area.

OAC 3745-53 TRANSPORTER REQUIREMENTS (40 CFR PART 263)	Y/N/NA	REMARK #
Has the entity registered with the Public Utilities Commission of Ohio as a transporter or hazardous waste? [3745-53-11] (263.11)	Y	
What is the entity's PUCO Number?		032493-USDOT MC 18861-PUCO 304-HW-
2. Has the transporter notified USEPA and received a USEPA ID number prior to transporting hazardous waste?	Y	
3. Has the transporter accepted hazardous wastes for transport only when the waste was accompanied by a manifest prepared by the generator in accordance with 3745-52, (Part 262, Subpart B)? [3745-53-20(A)] (263.30)	Y	
4. Has the transporter signed the manifest as required by 3745-53-20 and carried the manifest with the waste shipment as required by 3745-53-20(C) (263.20(c))?	Y	
5. Upon delivery of the hazardous waste to the next transporter or the designated facility, has the transporter signed the manifest as required under 3745-53-20(D)(1) and retained a signed copy for at least 3 years? [3745-53-22(A)] (263.20 and 263.22)	Y	
6. Has the transporter delivered the entire quantity of waste accepted from the generator in accordance with manifest instructions?	Y	
In cases where this was not possible, has transporter contacted the generator for further instructions and revised the manifest accordingly? [3745-53-21(A)(B)] (263.21)	NA	
7. If hazardous waste has been delivered to rail transporters or water transporters, has the original transporter complied with the manifest handling requirements of 3745-53-20(E)(F) (263.20(e)(f)?	NA	

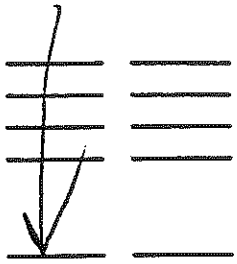
REMARK #

Y/N/NA REMARK #

nsporter received SQG wastes for transport pursuant
mation agreement, was the following information
n a log or shipping paper carried with the
[3745-53-20(H)] (263.20(h))

NA

me, address and USEPA ID # of SQG
antity of waste
T required shipping information
te waste accepted
re records related to the shipments maintained for
least 3 years following expiration of the
clamation agreement



REMARKS, TRANSPORTER REQUIREMENTS

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3745-53-

	Y/N/NA	REMARK #
rketer obtained written notice before initiating shipment certifying that receipients of his hazardous have notified USEPA of their hazardous waste activity urn hazardous waste fuel only in boilers or industrial [3745-58-45(E), 3745-58-46(F)] (266.34(e))	Y	
rketer provided notice to companies from which he will zardous waste fuel that he has notified USEPA of his waste activity [3745-58-45(F)] (266.34(e))	NA	all hazardous waste fuels generate on site
of the required certification maintained for 3 year by arketer and receiving burner? [3745-58-45(G))	NA	
applicable recordkeeping requiremetns under OAC 745-52, 3745-54, and 3745-65 (Parts 262, 264, and ained by the marketer?	Y	
us waste burned in appropriate devices as defined by (B) (266.31(b))?	NA	
rner provided a one-time written and signed notice keter certifying that:		
e burner has notified USEPA of its waste-as-fuel tivities?		
e burner will burn in a boiler or furnace identified 3745-58-42(B) (266.31(b)?		
of required certification maintained for 3 years by arketer and receiving burner? [3745-58-46(G)] (266.35(e))		
applicable recordkeeping requirements under parts 4 through 3745-65, through 3745-69 and 3745-56-20 45-56-59 and 3745-67-20 through 3745-67-58 (262, 264, aintained by the marker/burner?		

OAC 3745-65-et seq. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

		Y/N/NA	REMARK #
1.	Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	Y	
2.	Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	Y	
3. a.	Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	Y	
b.	Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	Y	

IF BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.

4.	Does the facility have -		
a.	A 24-hour surveillance system, or	N	
b.	An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	Y	
5.	Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))	Y	
6. a.	Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	Y	

		Y/N/NA	REMARK #
b.	Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))	Y	
7.	Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))	Y	
8.	Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.16(d)(e))	Y	
9.	If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)		
a.	Protection from sources of ignition.	Y	
b.	Physical separation of incompatible waste materials.	Y	
c.	"No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	Y	
d.	Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)	Y	

OAC 3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)

		Y/N/NA	REMARK #
1.	Is the facility operated to minimize the possibilty of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	Y	
2.	Has there been a fire, explosion or non-planned release of waste at the facility?	Y	2 incidents 6/13/89 8/7/89
	a. If yes, has the contingency plan been implemented?	Y	
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)		
	a. Internal alarm system?	Y	paging system
	b. Access to telephone, radio or other device for summoning emergency assistance?	Y	
	c. Portable fire control equipment?	Y	
	d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	Y	
4.	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	Y	
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	Y	
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	Y	
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and the facility layout? [3745-65-37(A)] (265.37(a))	Y	Fire Dept toured facility in October, 1989.

	Y/N/NA	REMARK #
o. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))	NA	

OAC 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

	Y/N/NA	REMARK #
1. Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-52(A)(B)(C)(D)(E)] (265.52):		
a. Actions to be taken by personnel in the event of an emergency incident?	Y	
b. Arrangements or agreements with local or state emergency authorities?	Y	
c. Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?	Y	
d. A list of all emergency equipment including location, physical description and outline of capabilities?	Y	
e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(f))?	Y	
2. Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)	Y	
3. Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)	Y	
4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)	Y	
5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))	Y	2 incidents 6-13-89 8-7-89

OAC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

		Y/N/NA	REMARK #
1.	Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:		
a.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal? [3745-65-73(B)(1)] (265.73(b)(1).	Y	
b.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	Y	
c.	The estimated (or actual) weight, volume or density of the waste material?	Y	
d.	A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)	Y	
e.	The present physical location of each hazardous waste within the facility?		
f.	Records of incidents which require implementation of the Contingency Plan?	Y	
g.	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))	NA	
h.	Records of any waste analyses and trial tests required to be performed?	NA	
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?	NA	
j.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?	NA	

	Y/N/NA	REMARK #
k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	NA	
2. Has the o/o submitted an annual (bienniel) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?	Y	
NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.		
3. Are manifests received by the facility signed and dated?	Y	
Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years? [3745-65-71(A)] (265.71)	Y	
a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	NA	
b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	NA	
4. Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?	NA	
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?	NA	

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

		Y/N/NA	REMARK #
1.	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	Y	
	a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.	Y	Note: Partial closure Plans for 20,000 gal tank and solidification unit are under review. Partial closure Plan for old tank farm and cistern are to be submitted in 30 days. Final Closure Plan in Part B
	b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).	Y	
	c. An estimate of the maximum amount of hazardous waste ever in inventory.	Y	
	d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.	Y	
	e. The year closure is expected to begin and a schedule for the various phases of closure.	Y	
	f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.	NA	
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))	NA	
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	NA	
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	Y	

		Y/N/NA	REMARK #
	Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	NA	
6.	Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))	NA	
7.	Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)	NA	
8.	Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plant in accordance with OAC 3745-66-16?	NA	
9.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?		Cistern Closure not yet complete. Partial closure plan to be submitted in 30 days
10.	If closure was partial, list the regulated units which remain in use at the faciilty:		
11.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	NA	
12.	Does the post-closure plan include:		
	a. A description of proposed ground water monitoring?	NA	
	b. A description of planned maintenance activities?	NA	
	c. The name, address and phone number of person/office to contact during the post-closure period?	NA	

	Y/N/NA	REMARK #
13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after certification of closure? [3745-66-19] (265.119)	NA	
14. Has the owner of the property on which a disposal unit is located recorded on the deed that:		
a. The land has been used to manage hazardous waste and the type, quantity and location of waste?	NA	
b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)	NA	

OAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I)

	Y/N/NA	REMARK #
1. Are hazardous wastes stored in containers which are:		
a. Closed [3745-66-73(A)] (265.173)?	Y	
b. In good condition [3745-66-71] (265.171)?	Y	
c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	Y	
2. Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	Y	
3. Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	Y	
4. Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	Y	
5. Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	Y	
6. Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	Y	

OAC 3745-66 STORAGE AND TREATMENT IN TANKS (40 CFR PART 265, SUBPART J)

Applicability: This checklist applies to owners or operators of facilities that use tank systems for storing or treating hazardous waste.

Note: Tanks used to store or treat wastes containing no free liquids (confirmed by the paint filter liquid test) that are located inside a building with an impermeable floor are exempt from secondary containment requirements 3745-66-93 (265.193).

For generators who store wastes in tanks for less than 90 days use all items except 24. Compliance with 3745-66-97(C) and OAC 3745-66-991 (265.191) (265.197) is not required.

		Y/N/NA	REMARK #
1.	Has the o/o obtained a variance from the secondary containment requirements of 3745-66-93 (265.193) from the (Regional Administrator/Director. If yes, skip items 2 through 6.	N	
2.	Has the o/o installed secondary containment which meets the requirements of 3745-66-93 (265.193) for each of the following classes of tank systems by the date specified. [3745-66-93(A)] (265.193)		
	a. For all new tank systems prior to being put into service.	N	New tanks placed into service prior to completion. cited previously.
	b. For all existing tanks used to handle waste No.'s F020, F021, F022, F023, F026, F027, before January 12, 1989.	NA	
	c. For existing tank system of known and documentable age, the latter of January 12, 1989, or when the tank reaches 15 years of age.	Y	Acid tank does not yet need secondary containment. Installed for all tanks not moved to new tank farm.
	d. For existing tank systems of undocumentable age, by January 12, 1995 or, if the facility was built prior to January 12, 1980, the latter of (1) when facility reaches 15 years of age or (2) January 12, 1989.		
	e. For tank systems used to handle materials that became hazardous wastes after January 12, 1987, within the time frames required in (a) and (b) above, except that the date the material becomes a hazardous waste plus two years must be usbstituted for January 12, 1989.	NA	

	Y/N/NA	REMARKS

Note: If the tank system has no secondary containment, skip to #7.

3. Was the secondary containment system(s) at the facility designed, installed and operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulated liquids . [3745-66-93(B)] (265.193(b)) — Y — coated with resistant polymer coating.

4. At a minimum is the secondary containment system: [3745-66-93(C)] (265.193(c))

   a. Constructed or lined with compatible materials with sufficient strength to prevent failure. — Y
   b. Placed on a foundation or base capable of providing support. — Y
   c. Provided with a leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste in the secondary containment system within 24 hours of at earliest practicable time is provided. — Y — Leak detection by daily inspection
   d. Sloped or designed to drain and remove liquid resulting from leaks, spills or precipitation and is liquid removed within 24 hours or in a timely manner. — Y

5. Is the secondary containment system for tanks a liner (external to the tank), vault, double-walled tank or an equivalent device approved by the Director/Regional Administrator? [3745-66-93(D)(E)] (265.193(d)(e)) — Y — Concrete Liner

   a. External Liner

      1. Is the external liner designed and operated to contain 100% of the capacity of the largest tank? — Y
      2. Is the external liner designed and operated to prevent run-on and infiltration into the liner; or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm? — Y

	Y/N/NA	REMARK #
3. Is the exterian liner free of cracks and gaps?	Y	
4. Does the external liner completely surround the tank and cover all earth likely to be contacted by waste during release?	Y	

b. Vault System

1. Is the valut system designed and operated to contain 100% of the capacity of the largest tank?	NA	
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?		
3. Are chemically resistant water stops in place at all joints?		
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?		
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?		
6. Is the vault system provided with an exterior moisture barrier?		

c. Doubled-Walled Tank

1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained?	NA	
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?		
3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?		

	Y/N/NA	REMARK #
Is ancillary equipment including above ground piping, welded flanges and joints, sealless pumps and valves, provided with secondary containment (e.g., double-walled piping, jacketing, trench)?	N	
a. If no, is ancillary equipment inspected daily for leaks? [3745-66-93(F)] (265.193(f))	Y	
7. For existing tank system, without secondary containment that meets 3745-66-93 (265.193) standards, does the o/o have a written assessment certified by an independent P.E. that includes all of the following: [3745-66-91(A)(B)] (265.191(a)(b))	Y	
a. Design standards?	Y	
b. The characteristics of hazardous waste(s) that have been or will be handled?	Y	
c. Corrosion protection measures?	Y	
d. The age of the tank system has been estimated or documented?	Y	
e. A leak test for non-enterable underground tanks?	NA	
f. A leak test or an internal inspection by qualified P.E. for other than non-enterable underground tanks?	Y	
8. Have the tests specified in 7f and 7g been conducted annually until secondary containment is provided [3745-66-93(I)(4)] (265.193(4)):	Y	Last conducted in June 1989
9. For tank systems found to be leaking or unfit for use as a result of the above tests or inspections, has the o/o complied with 3745-66-96 (265.196)? If no, this is a violation of [3745-66-93(I)(4) (265193(i)(4))	NA	
10. For tanks without secondary containment used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)] (265.191(c))	NA	

	Y/N/NA	REMARK #
For all tanks found to be leaking or unfit for use as a result of the assessment the o/o has complied with 3745-66-96 265.196 (see #18) [3745-66-91(D)] (265.191(d) and [3745-66-93(I)] (265.193(i)(4))	NA	
12. For new tank systems, (constructed began after July 14, 1986) has the o/o obtained a written assessment certified by an independent qualified P.E. that includes all of the following: [3745-66-92(A)] (265.192(a))		
a. Design standards	N	outstanding violation from April 1989 inspection
b. The characteristics of hazardous waste to be stored or treated	N	"
c. Corrosion protection for tank systems in contact with soil or water	N	"
d. Protection from vehicular traffic for undergroun tanks	N	"
e. Adequacy of tank foundation, proper anchoring and effects of frost heave	N	"
13. Does the o/o have on file at the facility, written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed, designed and that required repairs were performed [3745-66-92(G)] (265.192(g)). Does the statement address all of the following:		
a. Inspection for damage and/or inadequate construction and installation and a statement that deficienices were corrected before the tank system was covered or put into use. [3745-66-92(B)] (265.192(b))	N	outstanding violation from April 1989 inspection
b. Proper backfilling; [3745-66-92(C)] (265.192(c))	N	"
c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))	N	"
d. Proper support and protection of ancillary equipment; [3745-66-92(E)] (265.192(e))	N	"
e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))	N	"

	Y/N/NA	REMARK #

Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank but has not migrated beyond the zone of engineering control complied with 3745-66-96(A)(B)(C)(E)(F) and 265.196 (a)(b)(c)(e) and (f) and decontaminated or removed contamined soil. If soil cannot be removed, has the tank been closed [3745-66-93(G)(3)] (265.193(g)(3)) — NA

15. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank and has migrated from the zone of engineering control complied with 3745-66-96(A)(B)(C) and (D) (265.196 (265.193(g)(4)(i) and (ii)? See #18 — NA

16. Does the o/o follow the general operating requirements below: [3745-66-94] (265.194)

a. Hazardous waste or treatment reagents are not placed in the tank or secondary containment if they can cause the system to leak, rupture, corrode, or owthwise fail. — Y
b. The o/o uses appropriate controls to prevent spills or overflows from the system (e.g., check valves, high level alarms) — Y — High level alarms being installed at time of inspection
c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred. — NA

17. Has the o/o documented the inspections required in 3745-66-95 (265.195), in the operating record of the facility, including the following:

a. Spill control equipment (daily). — Y
b. Above ground portion of the tank (daily). — Y
c. Data from leak detection equipment (daily). — NA
d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily). — Y

	Y/N/NA	REMARK #
e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter.	NA	
f. All sources of impressed current at least bi-monthly.	NA	
18. Has the o/o of a tank system or secondary containment system <u>from which there has been a leak or spill or which is unfit for use</u> removed the tank from service and satisfied the following requirements. 3745-66-96 (265.196)		
a. Immediately ceased flow into tank and investigated cause of release	NA	
b. For release from tank system, removed waste to prevent further release within 24 hours of detection or earliest practicable time.		
c. For releases to a secondary containment system removed all released material within 24 hours or as timely as possible to prevent harm to human health and the environment.		
d. Immediately conducted a visual inspection of the release and prevent further migration and removed and disposed of any visible contamination of soil or surface water.		
e. Reported any release to the environment to the Director (Regional Administrator) within 24 hour unless it is less than 1 lb. and was cleaned up immediately.		
f. Submitted a report wihtin 30 days of the release to Director (Regional Administrator).	↓	
19. If a release has occured from the tank system have the following requirements been satisfied: 3745-66-96(E)(1) (265.196(e)(1))		
a. The cause of the release was a spill which did not damage the tank system and the o/o returned the system to service.	NA	
b. The cause of the release was a leak from the primary tank and the system was repaired and returned to service.	↓	

	Y/N/NA	REMARKS
c. If the source of the release was a leak from a component without secondary containment the component was provided with secondary containment or visually inspected above ground.	NA	
d. If a through e have not been satisfied, has the tank been closed in accordance with OAC 3745-66-97?		
e. The o/o has obtained certification from an independent P.E. if the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel).		
20. If the requirements if #17 have not been met, has the o/o completed closure of the tank system in accordance with 3745-66-97 (265.197)?	NA	
21. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] (265.198(a))		
a. The waste is treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o complied with 3745-65-17(B) (265.17(b)); or	N	
b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or	Y	
c. The tank is used solely for emergencies.	NA	
22. If ignitable or reactive waste is stored or treated, are protective distances maintained between waste management area and any public streets, alleys or adjoing property lines as required by the NFPA flammable or combustible code (1977 or 1981): [3745-66-98(B)] (265.198(b))	Y	

	Y/N/NA	REMARK
Has the o/o placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material [3745-66-99] (265.199)?	N	
a. If so, have the requirements of 3745-65-17(B) (265.17(b)) been met?	NA	
24. In addition to conducting the waste analysis required by 3745-65-13 (165.13) when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-991] (265.200)		
a. Conducted waste analysis and trial treatment storage tests.	Y	Compatability test performed
b. Obtained written documentation on similar waste under similar operating conditions.	NA	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Hukill Chemical Corp.

U.S. EPA I.D. No.: OHD 001 926 740

Street: 7013 Krick Rd.

City: Bedford State: Ohio Zip Code: 44146

Telephone: (216) 232-9400

Operator: Same as above

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: Same as above

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 11/14/89 Time: ____-____ Weather Conditions: _____

	Name	Affiliation	Telephone
Inspectors:	Paul Anderson	Ohio EPA	(216) 425-9171

Facility Representatives: _____

_____

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	✓	✓		
Transporter	✓	✓		
Treater				
Storer	✓	✓		
Disposer				

INSPECTION SUMMARY

Hukill Chemical Corp is a Solvent recycler and a hazardous waste fuel marketer. Permitted hazardous waste units consist of tanks and drum storage. Bulk and drummed wastes are transported to the site primarily by Hukill's own vehicles and are reclaimed via fractionation/distillation, blended into hazardous waste fuels or transported on for treatment at other permitted facilities.

Waste codes accepted are:
D002, D001, F001, F002, F003, F004, F005, U019, U031, U037, U154, U159, U220, U226

No soft hammer wastes have been received at the facility since the 1st and 2nd third rules took effect.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes					
1.	F001	✓		✓		✓
2.	F002	✓		✓		✓
3.	F003	✓		✓		✓
4.	F004	✓		✓		✓
5.	F005	✓		✓		✓

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L					
Cadmium	100 mg/L	✓		✓		✓
Chromium VI	500 mg/L	✓		✓		✓
Lead	500 mg/L	✓		✓		✓
Mercury	20 mg/L					
Nickel	134 mg/L					
Selenium	100 mg/L					
Thallium	130 mg/L					

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

Gen.	Treat	Store	Disp.	Trans.
✓	____	✓	____	✓

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

	Gen.	Treat	Store	Disp.	Trans.
50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	____	____	____	____	____
F007	____	____	____	____	____
F008	____	____	____	____	____
F009	____	____	____	____	____
F019	____	____	____	____	____
K001*	____	____	____	____	____
K004*	____	____	____	____	____
K008*	____	____	____	____	____
K011	____	____	____	____	____
K013	____	____	____	____	____
K014	____	____	____	____	____
K015*	____	____	____	____	____
K016*	____	____	____	____	____
K017	____	____	____	____	____
K018*	____	____	____	____	____
K019*	____	____	____	____	____
K020*	____	____	____	____	____
K021*	____	____	____	____	____
K022*	____	____	____	____	____
K024*	____	____	____	____	____
K025*	____	____	____	____	____
K030*	____	____	____	____	____
K031	____	____	____	____	____
K035	____	____	____	____	____
K036*	____	____	____	____	____
K037*	____	____	____	____	____
K044*	____	____	____	____	____
K045*	____	____	____	____	____
K046*	____	____	____	____	____

	Gen.	Treat	Store	Disp.	Trans.
K047*					
K048*					
K049*					
K050*					
K051*					
K052*					
K060*					
K061*					
K062*					
K069*					
K071*					
K073*					
K083*					
K084					
K085					
K086*					
K087*					
K099*					
K100*					
K101*					
K102*					
K103*					
K104*					
K106*					
P001					
P004					
P005					
P010					
P011					
P012					
P015					
P016					
P018					

	Gen.	Treat	Store	Disp.	Trans.
P020					
P030					
P036					
P037					
P039					
P041					
P048					
P050					
P058					
P059					
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087					
P089					
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120					
P122					
P123					
U007					
U009					

APP

	Gen.	Treat	Store	Disp.	Trans.
U010	—	—	—	—	—
U012	—	—	—	—	—
U016	—	—	—	—	—
U018	—	—	—	—	—
benzene U019	—	—	✓	—	✓
U022	—	—	—	—	—
U029	—	—	—	—	—
n butyl alcohol U031	—	—	✓	—	✓
U036	—	—	—	—	—
Chlorobenzene U037	—	—	✓	—	✓
U041	—	—	—	—	—
U043	—	—	—	—	—
U044	—	—	—	—	—
U046	—	—	—	—	—
U050	—	—	—	—	—
U051	—	—	—	—	—
U053	—	—	—	—	—
U061	—	—	—	—	—
U063	—	—	—	—	—
U064	—	—	—	—	—
U066	—	—	—	—	—
U067	—	—	—	—	—
U074	—	—	—	—	—
U077	—	—	—	—	—
U078	—	—	—	—	—
U086	—	—	—	—	—
U089	—	—	—	—	—
U103	—	—	—	—	—
U105	—	—	—	—	—
U108	—	—	—	—	—
U115	—	—	—	—	—
U122	—	—	—	—	—
U124	—	—	—	—	—

APP

		Gen.	Treat	Store	Disp.	Trans.
	U129	—	—	—	—	—
	U130	—	—	—	—	—
	U133	—	—	—	—	—
	U134	—	—	—	—	—
	U137	—	—	—	—	—
	U151	—	—	—	—	—
methanol	U154	—	—	✓	—	✓
	U155	—	—	—	—	—
	U157	—	—	—	—	—
	U158	—	—	—	—	—
MEK	U159	—	—	✓	—	✓
	U171	—	—	—	—	—
	U177	—	—	—	—	—
	U180	—	—	—	—	—
	U185	—	—	—	—	—
	U188	—	—	—	—	—
	U192	—	—	—	—	—
	U200	—	—	—	—	—
	U209	—	—	—	—	—
	U210	—	—	—	—	—
	U211	—	—	—	—	—
	U219	—	—	—	—	—
Toluene	U220	—	—	✓	—	✓
	U221	—	—	—	—	—
	U223	—	—	—	—	—
methyl chloroform	U226	—	—	✓	—	✓
	U227	—	—	—	—	—
	U228	—	—	—	—	—
	U237	—	—	—	—	—
	U238	—	—	—	—	—
	U248	—	—	—	—	—
	U249	—	—	—	—	—

Note: all u-waste codes are on the facility Part A application. No wastes have been received under these waste codes since the soft-hammer requirements became effective.

Revised 9-26-88

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

✓ Yes ____ No ____ NA

If yes, check the appropriate treatability group.

____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
____ Pharmaceutical wastewater containing spent methylene chloride
✓ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

____ Yes ____ No ✓ NA

If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

____ Yes ____ No ✓ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

_____
_____
_____

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

____ Yes ____ No ____ NA

If yes, check the appropriate treatability group.

____ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)
____ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

✓ Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

✓ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate.

- TCLP

____ Yes ✓ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

✓ Yes ____ No ____ NA

If yes, specify the waste stream: Hazardous waste fuel or still bottoms from solvent recovery, [redacted]

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?
All waste streams tested prior to receipt. Generated wastes are screened on site and tested by designated TSD facility

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

____ Yes ✓ No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes ____ No ✓ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

✓ Yes ____ No ____ NA

If yes, is any supporting data available for review? Describe how this is adequate. Based on knowledge of waste streams managed at the facility

- Testing

✓ Yes ____ No ____ NA

If yes, list test method used: Testing by receiving TSD Incinerator Total metals analysis

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

____ Yes ✓ No ____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: ____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes ✓ No ____ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

____ Yes ____ No ✓ NA currently permitted to accept some soft hammer waste, however infrequent shipments only. Generate no first third wastes.

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

____ Yes ____ No ____ Soft hammer

If yes, specify the waste stream: ____

How was this determination made?

- Knowledge of waste

____ Yes ____ No

If yes, is any supporting data available for review? Describe how this is adequate. ____

- TCLP

___ Yes ___ No ✓ NA

- Total Constituent Analysis

___ Yes ___ No ✓ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

___ Yes ___ No ✓ NA

d. How does the generator test the waste when a process or waste stream changes?

C. Management

1. On-Site Management

Is restrict waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

✓ Yes ___ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

✓ Yes ___ No

b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

___ Yes ___ No

c. Does notification contain the following?

EPA Hazardous waste number(s)	✓ Yes	___ No
Applicable treatment standards	✓ Yes	___ No
Manifest number	✓ Yes	___ No
Waste analysis data, if available	✓ Yes	___ No

Identify off-site treatment or storage facilities: Systech - Alpena, Paulding; Green-Ross Incineration; Tricil, Willard, Ohio; Solidtek, GA (OHm Resource Recovery); Research Oil; ~~Clean Harbors, Cleveland~~ Castle facilities;

d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

___ Yes ✓ No

e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

___ Yes ___ No NA

f. Does notification contain the following?

EPA Hazardous waste number(s)	___ Yes	___ No
Applicable treatment standards	___ Yes	___ No
Manifest number	___ Yes	___ No
Waste analysis data, if available	___ Yes	___ No
Certification that the waste meets treatment standards	___ Yes	___ No

Identify off-site land disposal facilities: _____

g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

___ Yes ✓ No ___ NA

h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

___ Yes ___ No NA

i. If yes, does the notification contain the following information?

EPA Hazardous waste number	____ Yes	____ No
The corresponding treatment standards and all applicable prohibitions	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Date the waste is subject to the prohibitions	____ Yes	____ No

j. Does the generator retain copies of all notices and certifications for a period of 5 years?

____ Yes ____ No

D. Demonstration and Certification -- "Soft Hammer" Wastes

a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

____ Yes ____ No NA

b. Has the generator submitted to the Regional Adminstration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	____ Yes	____ No
Addresses	____ Yes	____ No
Telephone Numbers	____ Yes	____ No
Contact dates	____ Yes	____ No

Attach a copy of the demonstration and certification

c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?

____ Yes ____ No

If yes, attach a copy of written discussion.

d. Does the generator ship his waste off-site for treatment?

____ Yes ____ No

Describe the type of treatment and treatment facilities _____

e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

____ Yes ____ No

f. Does the generator provide certification with each subsequent shipment of wastes?

____ Yes ____ No

g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number ____ Yes ____ No

(ii) Manifest number ____ Yes ____ No

(iii) Waste analysis data, if available ____ Yes ____ No

h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

____ Yes ____ No

E. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

✓ Yes ____ No

If yes, list types of waste treatment units and processes:
Distillation Columns, totally Enclosed acid regeneration

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

____ Yes ✓ No

If yes, check the appropriate regulatory status:
____ Interim status for storage
____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

B. Does the transporter mix, combine, or recontainerize wastes?

____ Yes ✓ No Shipped directly to permitted storage facility

C. Is the waste treated in an exempt treatment process on-site?

____ Yes ____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ✓ Yes ___ No ___ NA

   o California List ✓ Yes ___ No ___ NA

   o First Third ✓ Yes ___ No ___ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ✓ Yes ___ No

   a. What date was the waste analysis plan last revised? 6/23/89

   b. Are analyses conducted on-site or off-site?

   ✓ On-site ___ Off-site

   Identify off-site lab: _____

   c. Is F-solvent waste analyzed using TCLP?

   ___ Yes ✓ No ___ NA

   d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

   ___ Yes ___ No ✓ NA Facility is permitted only to accept soft hammer wastes at this time.

   Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

✓ Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

✓ Yes ____ No

If no, go to C, Treatment.

2. If yes, check the appropriate method.

✓ Tanks
✓ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

✓ Yes ____ No ____ NA

Required information is available through cross reference of manifest document number labelled on drums to the facility operating record which contains information pertaining to drum contents and storage date.

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

✓ Yes ____ No

5. Do operating records agree with container labeling?

✓ Yes ____ No ____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

✓ Yes ____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

____ Yes ✓ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ✓ No ____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

✓ Yes ____ No ____ NA

Operating record documents tank contents and dates of storage.

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ✓ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

_____

_____

_____

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

____ Yes ____ No

4. Is dilution used as a substitute for treatment?

____ Yes ____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

____ Yes ____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

____ Yes ____ No ____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets the treatment standards	____ Yes	____ No

Identify off-site disposal facilities: _____

_____

_____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

____ Yes ____ No ____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

____ Yes ____ No

D. Treatment in Surface Impoundments

1. Are restricted wastes placed in surface impoundments for treatment?

____ Yes ✓ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

____ Yes ____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

____ Yes ____ No ____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

____ Yes ____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

____ Yes ____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

____ Yes ____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

____ Yes ____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

____ Yes ____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

____ Yes ____ No

If yes, at what frequency? _____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

____ Yes ____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

____ Yes ____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

_____

_____

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

RCRA INTERIM STATUS INSPECTION FORM

Facility Name: Hukill Chemical Corp.
Address: 7013 Krick Rd
Bedford, OH 44146
County: S Cuyahoga

Date of Inspection 3-21-89
HWFB #: 02-18-0315
USEPA ID #: OHD 001 926 740
Facility Phone #: (216) 232-9400

Facility Contact: Robert Hukill
Ed Price
Inspector(s)Name(s): Paul Anderson

Facility Contact Phone#: (216) 232-9400
Safety Equipment #: _____

STATUS
Cond. Ex. SQG___ SQG___ Generator X Transporter___ Treatment___ Storage X Disposal___
ACTIVITIES
Containers X Tanks X Surface Impoundments___ Incineration/Thermal treatment___
Waste pile___ Land treatment___ Landfill___ Groundwater monitoring___
Used oil burner___ Hazardous waste fuel burner/blender___

Note: Inspection for Tank rules only.

		Y/N/NA	REMARK #
1.	Does the facility produce "discarded materials" as defined in 3745-51-02(A)?		
2.	Are they :		
	a. Abandoned(disposed;incinerated;accumulated, stored, or treated prior to disposal)?		
	b. Recycled?		
	c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?		
3.	If recycled or accumulated, treated or stored before recycling, is the waste:		
	a. Used in a manner constituting disposal?		
	b. Burned for energy recovery?		
	c. Reclaimed? (Refer to Table 1 of 3745-51-02)		
	d. Accumulated speculatively?		
4.	Is the material recycled by being:		
	a. Used or reused as an ingredient in an industrial process to make a product without prior reclamation?		
	b. Used as an effective substitute for commercial products?		
	c. Returned to the original process from which it was generated without prior reclamation as a substitute for a raw material feedstock?		

		Y/N/NA	REMARK #
5.	Are LDR wastes generated? If so, complete appropriate LDR checklist.		
6.	Has the facility submitted a Part A to Ohio?		
7.	If yes, is it complete and accurate?		
8.	If not accurate, has a PCR been submitted? If yes, what date was the PCR submitted?		
9.	Is the facility operating in compliance with the terms and conditions of its HWFB permit?		
10.	Has the facility submitted a Part B?		
11.	Was advance notice of the inspection given? If so, how far in advance?	Y	1 week

Note: Inspection for tank rule compliance only

Hukill Chemical operates both permitted hazardous waste Storage tanks an <90 day storage tanks. Until recently the tanks were situated as follows:

7 - Permitted tanks located in earthen lined tank farm (V114, V214, V314, V414, V514, V614, V7
2 - Permitted tanks (E and W Feed tanks) located in concrete lined area
1 - Permitted tank for still bottom/storage (V117)
1 - emergency tank V112 (for spill control)
2 - hazardous waste fuels blend tanks (6,200 gal, 10,000 gal)
4 - <90 day cone bottom tanks (750 gal, 750 gal, 1500 gal, 4000 gal)
1 - Permitted tank for spent acid storage

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

An integrety assessment for the permitted tanks (V-117, V714, V614, V514, V414, V314, V214, V114, Good Water, and the Spent acid tank) was submitted in may of 1988. Shell thickness measurements were taken for the remainder of the tanks at that time as well. However, an assessment was not made for these tanks at that time.

All permitted tanks are now located in concrete lined, diked tank farms. However, none of the secondary containment areas have yet been coated with impermeable coatings as required.

OAC 3745-66 STORAGE AND TREATMENT IN TANKS (40 CFR PART 265, SUBPART J)

Applicability: This checklist applies to owners or operators of facilities that use tank systems for storing or treating hazardous waste.

Note: Tanks used to store or treat hazardous wastes containing no free liquids and that are inside a building with an impermeable floor, the Paint Filter Liquid Test must be used to confirm the absence or presence of liquids in the waste and tanks and sumps used as part of a secondary containment system are exempt from 3745-66-93 (265.193).

For generator who store wastes in tanks for less than 90 days use items 1-5, 18 and 22-25. Except that compliance with with 3745-66-97(C) (265.197) is not required.

	Y/N/NA	REMARK #
1. For existing tank systems without secondary containment that meets 3745-66-93 (265.193) standards, does the owner/operator (o/o) have a written assessment on file at the facility that meets all of the following requirement? [3745-66-91(A)(B)] (265.191(a)(b))	Y	– Permitted tanks Feed tanks, bottoms tanks
	N	< 90 day blend tanks 24 hr. blend tanks
a. It is certified by an independent Professional Engineer (P.E.).	Y	Permitted tanks
b. Design standards have been considered.	Y	"
c. The characteristics of hazardous waste(s) that have been or will be handled have been considered.	Y	"
d. Corrosion protection measures have been considered.	Y	All now elevated or on concrete pads
e. The age of the tank system has been estimated or documented.	Y	"
f. A leak test for non-enterable underground tanks has been conducted.	NA	
g. A leak test or an internal inspection by qualified P.E. has been conducted for other than non-enterable underground tanks.	Y	– aboveground permit tanks
	N	– ≤ 90 day storage tanks
2. For tanks used to store or treat wastes which become hazardous wastes after July 14, 1986, has the o/o done the assessment within 12 months after the date the waste became a hazardous waste? [3745-66-91(C)] (265.191(c))	NA	

	Y/N/NA	REMARK #
3. For all tanks found to be leaking or unfit for use as a result of the assessment the o/o has complied with 3745-66-96 265.196 [3745-66-91(D)] (265.191(d))	NA	
4. For new tank systems, has the o/o obtained a written assessment certified by an independent qualified P.E. that includes all of the following? [3745-66-92(A)] (265.192(a))		
a. Design standards	NA	
b. The characteristics of hazardous waste to be stored or treated	NA	
c. Corrosion protection	NA	
d. Protection from vehicular traffic	NA	
e. Adequacy of tank foundation, proper anchoring and effects of front leave.	NA	
5. Does the o/o have on file at the facility, written statements, by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed, designed and that required repairs were performed [3745-66-92(G)] (265.192(g)). Does the statement address all of the following:		
a. Inspection for damage and/or inadequate construction and installation and a statement that deficiencies were corrected before the tank system was covered or put into use. [3745-66-92(B)] (265.192(b))	NA	
b. Proper backfilling; [3745-66-92(C)] (265.192(c))		
c. Tightness test, if the tank was found not to be tight proper repairs were made; [3745-66-92(D)] (265.192(d))		
d. Proper support and protection of auxiliary equipment; [3745-66-92(E)] (265.192(e))		
e. Supervision of the installation of field fabricated corrosion protection. [3745-66-92(F)] (265.192(f))		

	Y/N/NA	REMARK #
6. Has the o/o obtained a variance from the secondary containment requirements of 3745-66-93 (265.193) from the (Regional Director) (Administrator). If yes, skip items 7 through 11.	NA	
7. Has the o/o installed secondary containment which meets the requirements of 3745-65-93 (265.193) for each of the following classes of tank systems by the date specified. [3745-66-93(A)] (265.193)		
a. For all new tank systems prior to being put into service	NA	
b. For all existing tanks used to handle waste No.'s F020, F021, F022, F023, F026, F027, before January 12, 1989.	NA	
c. For existing tank system of known and documentable age, the later of January 12, 1989, or when the tank reaches 15 years of age.	N	Permitted tanks + 24 hr blend tanks have dike but no coating other <90 day tanks
d. For existing tank systems of undocumentable age, by January 12, 1995 unless the facility is greater than seven years old before the facility is fifteen years old.	NA	
e. For tank systems used to handle materials that became hazardous wastes after January 12, 1987, within the time frames required in (a) and (b) above, except that the date the material becomes a hazardous waste plus two years must be substituted for January 12, 1989.		
8. Was the secondary containment system(s) at the facility designed, installed and is operated to prevent any migration of wastes or liquid to the soil, ground water, or surface water and is it capable of detecting and collecting releases and accumulted liquids. [3745-66-93(B)] (265.193(b))	N	coated must be lined with impermeable material

	Y/N/NA	REMARK #

b. Vault System

1. Is the vault system designed and operated to contain 100% of the capacity of the largest tank? — NA
2. Is the vault system designed and operated to prevent run-off and infiltration into the vault system, or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?
3. Are chemically resistant water stops in place at all joints?
4. Is there a compatible interior coating or lining to prevent migration of waste into the concrete?
5. If ignitable or reactive waste is being managed, is the vault system provided with a means to prevent formation or ignition of vapors?
6. Is the vault system provided with an exterior moisture barrier?

c. Doubled-Walled Tank

1. Is the doubled-walled tank designed as an integral structure so any release from the inner tank is contained? — NA
2. If metal, are the primary tank interior and outer shell exterior surfaces protected from corrosion?
3. Is the double-walled tank provided with a continuous leak detection system able to detect a release within 24 hours or at the earliest practicable time?

11. Is ancillary equipment provided secondary containment and inspection daily (except above ground piping)? — Y — all above ground

	Y/N/NA	REMARK #
9. Does the secondary containment system meet the following minimum requirements of 3745-66-93(C)] (265.193(c)):		
a. It is constructed or lined with compatible materials with sufficient strength to prevent failure.	Y	
b. It is placed on a foundation or base capable of providing support.	Y	Roadbed was reconditioned to provide base for concrete
c. A leak detection system that is designed/operated to detect failure of primary or secondary containment or any release of hazardous waste in the secondary containment system within 24 hours or at earliest practicable time is provided.	Y	inspection program
d. It is sloped or designed to drain and remove liquid, liquid (including accumulated precipitation) is removed within 24 hours or in a timely manner.	Y	Sloped to area where sump to be installed
10. Is the secondary containment system for tanks a liner (external to the tank), vault, double-walled tank or an equivalent device approved by the Director/Regional Administrator?	Y	
a. External Liner		
1. Is the external liner designed and operated to contain 100% of the capacity of the largest tank?	Y	
2. Is the external liner designed and operated to prevent run-off and infiltration into the liner; or the collection system has excess capacity to contain run-on and infiltration from a 25-year, 24-hour storm?	Y	
3. Is the external liner free of cracks and gaps?	Y	
4. Does the external liner completely surround the tank and cover all earth likely to be contacted by waste during release?	Y	

	Y/N/NA	REMARK #
12. For tank systems for which secondary containment is not yet provided, does the o/o have on file at the facility a record of the following:		
a. For non-enterable underground tanks, a leak test conducted at least annually.	NA	
b. For all other tanks, an annual leak test or internal inspection by an independent P.E., and	N	conducted in January 1988. Should be redone.
c. For tank systems found to be leaking or unfil for use as a result of the above tests or inspections, thas the o/o complied with 3745-66-96 (265.196)? If no, this is a violation of [3745-66-93(I)(4)] (265.193(i)(4))	NA	
13. Has the o/o of a tank system <u>with a variance from</u> secondary containment <u>at which a release of hazardous waste has occurred</u> from the tank but has <u>not migrated beyond the zone of engineering control</u> complied with 3745-66-96(A)(B)(C)(E)(F) and 265.196 (a)(b)(c)(e) and (f) decontaminated or removed contaminated soil. If soil cannot be removed, has the tank been closed?	NA	
14. Has the o/o of a tank system with a variance from secondary containment at which a release of hazardous waste has occurred from the tank and <u>has migrated from the zone of engineering control</u> complied with 3745-66-96(A)(B)(C) and (D) (265.196 (a)(b)(c) and (d) and 3745-66-93(G)(4)(b) and (c) and (265.193(g)(4)(b) and (c)?	NA	
15. Has the o/o complied with the following for all tank systems until secondary containment is provided? [3745-66-93(I)] (265.193(i))		
a. Non-enterable underground tanks have had an annual leak test?	NA	
b. All other tanks have had an annual leak test or an internal inspection?	N	conducted in January 1988. must be redone.

		Y/N/NA	REMARK #
16.	Does the o/o have on file at the facility a results of the assessments in No. 15? {3745-66-93(I)(3)] (265.93(i)(3))	Y	January 1988 results.
17.	For tanks found to be leaking as a result of assessment in 3745-66-93(I)(1) through (3) (265 (i)(1) through (i)(3)), has the o/o complied with 3745-66-96 (265.196); [3745-66-93(I)(4)] (265.93(i)(4)	NA	
18.	Does the o/o follow the general operating requirements below: [3745-66-94] (265.94)		
	a. Hazardous waste treatment reagents are not placed in the tank or secondary containment if they can cause the system to leak, rupture, corrode, or otherwise fail.	NA	
	b. The o/o uses appropriate controls to prevent spills or overflows from the system.	Y	Float level gauges and daily inspection
	c. The o/o has complied with 3745-66-96 (265.196) when a leak or spill has occurred.	NA	
19.	Has the o/o documented the inspection required in 3745-66-95 (265.195), in the operating record of the facility, including the following:		
	a. Spill control equipment (daily).	Y	
	b. Above ground portion of the tank (daily).	Y	
	c. Data from leak detection equipment (daily).	Y	Level + gallons
	d. Construction materials and the immediate area surrounding the tank to detect signs of erosion or signs of releases of hazardous waste (daily).	Y	
	e. The cathodic protection system to confirm its proper operation within six months of its initial installation and annually thereafter.	NA	None installed not in soils
	f. All sources of impressed current at least bi-monthly.	NA	above ground.

	Y/N/NA	REMARK #

20. Response to leaks or spills and disposition of leaking or unfit for use tanks. Has the o/o of a tank system or secondary containment system from which there has been a leak or spill or which is unfit for use removed the tank from service and satisfied the following requirements. 3745-66-96 (265.196)

a. Immediately ceased flow into tank and investigated cause of release	NA	
b. For release from tank system, removed waste to prevent further release within 24 hours of detection or earliest practicable time.		
c. For releases to a secondary containment system removed all released material within 24 hours or as timely as possible to prevent harm to human health and the environment.		
d. Immediately conducted a visual inspection of the release and prevented further migration and removed and disposed of any visible contamination of soil or surface water.		
e. Reported any release to the environment to the Director (Regional Administrator) within 24 hours unless it is less than 1 lb. and was cleaned up immediately.		
f. Submitted a report within 30 days of the release to Director (Regional Administrator).		

21. Has the o/o closed the tank system or have the following requirements been satisfied: 3745-66-96(E)(1) (265.196(e)(1)

a. The cause of the release was a spill which did not damage the tank system and the o/o returned the system to service.	NA	
b. The cause of the release was a leak from the primary tank and the system was repaired and returned to service.		
c. If the source of the release was a leak from a component without secondary containment the component was provided with secondary containment or visually inspected above ground.		

	Y/N/NA	REMARK #
d. The o/o has obtained certification from an independent P.E. if the repairs were major (i.e., installation of liner, repair of ruptured primary or secondary containment vessel).	NA	
22. Has the o/o completed closure of the tank system in accordance with 3745-66-97 (265.197)?	NA	14,000 gallon water tank to be closed soon. Old tank area to also go thru closure.
23. For tanks used to treat or store ignitable or reactive wastes, has the o/o complied with one of the following: [3745-66-98(A)] (265.198(a))		
a. The waste is treated immediately after placement in the tank so that the resultant mixture is no longer ignitable or reactive and the o/o complied with 3745-65-17(B) (265.17(b)); or	NA	
b. The waste is stored or treated to protect it from materials or conditions which may cause ignition or reaction; or	Y	all are grounded and have flame arrestors
c. The tank is used solely for emergencies.	NA	
24. If ignitable or reactive waste is stored or treated is it stored or treated in compliance with the NFPA flammable and combustible code (1971 or 1981)? [3745-65-17(B) (265.17(b)) is complied with?	Y	
25. Has the o/o not placed incompatible wastes or materials into the same tank system or into a tank system that has not been decontaminated and which previously held an incompatible waste or material unless 3745-65-17(B) (265.17(b)) is complied with? [3745-66-99] (265.199)	Y	Bench scale test is conducted
26. In addition to conducting the waste analysis required by 3745-65-13 (165.13) when the tank system is used to store or treat a waste which is substantially different or uses a substantially different process than previously used, has the o/o done one of the following: [3745-66-99] (265.200)		
a. Conducted waste analysis and trial treatment storage tests.	NA	
b. Obtained written documentation or similar waste under similar operating conditions.	NA	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Hukill Chemical Corp.

U.S. EPA I.D. No.: OHD 001 926 740

Street: 7013 Krick Rd.

City: Bedford State: Ohio Zip Code: 44146

Telephone: (216) 232-9400

Operator: Same as above

Street:

City: State: Zip Code:

Telephone:

Owner: Same as above

Street:

City: State: Zip Code:

Telephone:

Inspection Date: 11/23/88 Time: 9:00 - 3:00 Weather Conditions: Sunny + Cool

	Name	Affiliation	Telephone
Inspectors:	Paul Anderson	Ohio EPA	(216) 425-9171
	Kevin Bongo	"	"
Facility Representatives:	Robert Hukill		(216) 232-9400

	RCRA Status	LDR Status F-Solvent	LDR Status California List
Generator	✓	✓	
Transporter	✓	✓	
Treater			
Storer	✓	✓	
Disposer			

Revised 11-03-87

INSPECTION SUMMARY

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	F-Solvent Wastes					
1.	F001	✓		✓		✓
2.	F002	✓		✓		✓
3.	F003	✓		✓		✓
4.	F004	✓		✓		✓
5.	F005	✓		✓		✓

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L					
Cadmium	100 mg/L	✓		✓		✓
Chromium VI	500 mg/L	✓		✓		✓
Lead	500 mg/L	✓		✓		✓
Mercury	20 mg/L					
Nickel	134 mg/L					
Selenium	100 mg/L					
Thallium	130 mg/L					

metal contaminated paint related wastes

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
___	___	___	___	___

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

Gen.	Treat	Store	Disp.	Trans.
✓	___	✓	___	✓

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

	Gen.	Treat	Store	Disp.	Trans.
50 ppm	___	___	___	___	___
500 ppm	___	___	___	___	___

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

___ Yes ___ No X NA

If yes, state reasons for mixing:

_____

_____

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
___	___	___	___	___

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

X Yes ____ No ____ NA

If yes, check the appropriate treatability group.

____ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
____ Pharmaceutical wastewater containing spent methylene chloride
X All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

____ Yes ____ No X NA

If yes, specify the method: _____

b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

____ Yes ____ No X NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

_____
_____
_____

B. Waste Analysis

1. F-Solvent Wastes

a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

X Yes ____ No ____ NA

How was this determination made?

- Knowledge of waste

X Yes ____ No

If yes, note how this is adequate: _____

- TCLP

____ Yes X No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

X Yes ____ No ____ NA
still bottoms from recycling of waste solvents

If yes, specify the waste stream:

c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

____ Yes X No ____ NA

d. How does the generator test F-solvent waste when a process or waste stream changes?
Process is constant, still bottoms are tested onsite for BTU and Chlorine. Systech conducts GC/ms analysis + VOC's + PCB analysis. One shipment two years ago was rejected by Systech because of PCB's. Disposed of at ENSCO.

2. California List Wastes

a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?
acknowledged to be a liquid by facility

____ Yes X No ____ NA

b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

____ Yes X No ____ NA

What type of absorbent is used? _____
Check the types of waste to which absorbent is added.

___ Liquid hazardous waste having a pH less than or equal to 2

___ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

___ Liquid hazardous waste containing metals

___ Liquid hazardous waste containing free cyanides

c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

X Yes (acids) X No (Paint related wastes managed by facility) ____ NA

If yes, note how this is adequate: _____

- Testing

X Yes ____ No ____ NA

If yes, list test method used: Ross Incineration and periodically by a contract lab. Atomic absorption spectrophotometry is conducted by Systech

d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

____ Yes X No ____ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: _____

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

____ Yes X No ____ NA

Create analysis plan does not provide for screening for metals on a consistent basis.

Paint related wastes may exceed prohibition levels for lead, chromium or cadmium. Systech conducts total metals analysis but does not report their results back to Hukill Chemical. Ross Incineration does periodic checks but facility (Hukill) only tests wastes periodically.

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

X Yes ____ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

X Yes ____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

X Yes ____ No

If yes, does notification contain the following?

	F solvents (and acids)	California list (except acids)
EPA Hazardous waste number(s)	X Yes	X No
Applicable treatment standards	X Yes	X No
Manifest number	X Yes	X No
Waste analysis data, if available	X Yes	X No

Identify off-site treatment or storage facilities: _____

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

____ Yes X No No wastes sent to land disposal facilities.

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets treatment standards	____ Yes	____ No

Identify off-site land disposal facilities: _____

c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

____ Yes ____ No X NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

X Yes ____ No

If yes, list types of waste treatment units and processes:

① Totally enclosed acid regeneration system
② Solvent distillation unit

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

____ Yes X No

If yes, check the appropriate regulatory status:
____ Interim status for storage
____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

B. Does the transporter mix, combine, or recontainerize wastes?

____ Yes X No

C. Is the waste treated in an exempt treatment process on-site?

____ Yes ____ No

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

____ Yes X No

If yes, check the appropriate regulatory status:
____ Interim status for storage
____ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: _____

B. Does the transporter mix, combine, or recontainerize wastes?

____ Yes X No

C. Is the waste treated in an exempt treatment process on-site?

X Yes ____ No

shipped to their own facility, has storage permit and exempt recycle permit

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ___X___ Yes _____ No _____ NA

   o California List _____ Yes ___X___ No _____ NA
   metals analysis needs to be incorporated

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ___X___ Yes _____ No

   a. What date was the waste analysis plan last revised? _____

   b. Are analyses conducted on-site or off-site?

      ___X___ On-site ___X___ Off-site

      Identify off-site lab: if additional analyses are necessary will send samples to Wadsworth Alert Labs.

   c. Is F-solvent waste analyzed using TCLP?

      _____ Yes ___X___ No _____ NA

   d. Describe the frequency of sampling: _____

   e. Describe procedures used to identify manifest discrepancies:

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

   ___X___ Yes _____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

X Yes ____ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

X Tanks
X Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

____ Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

X Yes ____ No

5. Do operating records agree with container labeling?

____ Yes ____ No ____ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

X Yes ____ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes ____ No

If yes, state how: _____

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

X Yes ____ No ____ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

X Yes ____ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No ____ NA

C. Treatment

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes X No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

____ Yes ____ No

4. Describe frequency of testing treatment residuals:

5. Is dilution used as a substitute for treatment?

____ Yes ____ No

6. Are notifications prepared by the generators kept in the facility's operating record?

____ Yes ____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

____ Yes ____ No ____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

____ Yes ____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	____ Yes	____ No
Applicable treatment standards	____ Yes	____ No
Manifest number	____ Yes	____ No
Waste analysis data, if available	____ Yes	____ No
Certification that the waste meets the treatment standards	____ Yes	____ No

Identify off-site disposal facilities: _____

_____

_____

D. <u>Treatment in Surface Impoundments</u>

1. Are restricted wastes placed in surface impoundments for treatment?

____ Yes X No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

____ Yes ____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

____ Yes ____ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

____ Yes ____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

____ Yes ____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

____ Yes ____ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge ____ Yes ____ No

Supernatant ____ Yes ____ No

a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

____ Yes ____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

____ Yes ____ No

c. Are residues subsequently managed in another surface impoundment?

____ Yes ____ No

d. Are residues treated prior to disposal?

____ Yes ____ No

If yes, are waste residues treated on-site or off-site?

____ On-site ____ Off-site

Identify treatment method: _____

_____

_____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

____ Yes X No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

_____

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]?

____ Yes ____ No

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

____ Yes ____ No

If yes, at what frequency? _____

_____

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

____ Yes ____ No

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

____ Yes ____ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

____ Yes ____ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

7. What is the volume of the restricted wastes disposed of to date?

_____

_____

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

Nov 23, 1988, 9:00 Am
Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

IWFAB # 02-18-0315

U.S. EPA I.D. # OHD 001 926 740

GENERAL INFORMATION

Facility: Hukill Chemical Corp. Address: 7013 Krick Rd City: Bedford

State: Ohio Zip Code: 44146 County: Cuyahoga Telephone: (216) 232-9400

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	Robert Hukill	President	(216) 232-9400
2.			
3.			

INSPECTOR(S)

1.	Paul Anderson	Environmental Scientist	425-9171
2.			
3.			

INSTALLATION ACTIVITY

Mark One

- ☐ Generator only (G)
- ☐ Transporter (T)
- ☐ TSDF only
- ☐ G-T
- ☐ G-TSDF
- ☐ T-TSDF
- ☒ G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- ☒ General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- ☒ Containers S01
- ☒ Tanks S02/T01
- ☐ Surface Impoundments S04/T02
- ☐ Incineration/Thermal Treatment
- ☐ Waste Piles S03
- ☐ Land Treatment D01
- ☐ Landfills D80
- ☐ Chemical/Physical/Biological T04
- ☐ Groundwater Monitoring
- ☐ Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	X	—	—	—
2. If "yes", is it complete and accurate?	X	—	—	—
3. Has the facility submitted a Part B?	X	—	—	—
4. Was advance notice of the inspection given? If so, how far in advance?	X	—	—	1 week

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

Hukill Chemical conducts solvent recycling and acid regeneration activities. Recycled solvents and acids are sold to industrial customers. Non-recyclable solvents and still bottoms are blended into a hazardous waste fuel which is shipped to Cement Kilns.

Hazardous wastes are managed in a drum storage area and in permitted storage tanks (8 for solvent recycling and 1 for waste acids). In addition 4 tanks are utilized for less than 90 day storage of solvent wastes.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	X	—	—	- Solvents from printing put into recycle unit - Final wastewater from still sent to Chem-Clear
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	X	—	—	
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	X	—	—	2 units Totally enclosed acid regeneration and distillation units
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	X	—	—	—
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	X	—	—	—
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	X	—	—	—
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	X	—	—	—
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	X	—	—	—

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	X	—	—	———
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	X	—	—	———
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	X	—	—	utilize Ross Transp. to Valley City to Syp. SRR. is contingen
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	—	—	X	———
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	X	—	X	Container have storage unit in interim status)
b) The date that accumulation began is clearly marked on each container.	—	—	X	———
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	X	—	—	———
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	X	—	—	———

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

Solid and Hazardous waste Streams

1. Spent acid
2. Still bottoms
3. Solids which go to Ross and Rollins - Deerpark, TX
4. Ind. wastewater from distillation unit
   water from solvents transferred to tank
   tank water then distilled and remaining
   ind. wastewater is shipped to Chem Clear.
5. Haz. waste fuel to Systech (Alpina, Greencastle and Paulding)

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 263 (OAC 3745-53) TRANSPORTER REQUIREMENTS

	Yes	No	N/A	Remark #
1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste. [3745-53-11]	X			
2. The transporter has accepted hazardous wastes for transport only when the waste was accompanied by a manifest prepared by the generator in accordance with Section 262 [3745-53-20(A)]	X			
3. The transporter has signed the manifest as required by Section 263.20(b) [3745-53-20(B)] and has carried the manifest with the waste shipment as required by Section 263.20(c) [3745-53-20(C)].	X			
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) [3745-53-20(D)(1)] and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)) [3745-53-22(A)].	X			
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21) [3745-53-21(A)(B)].	X			
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f) [3745-53-20(E)(F)].			X	
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) [3745-53-22(D)].			X	
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?		X		
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)) [3745-53-30(A)]			X	

	Yes	No	N/A	Remark #
b) Were all of the notifications required by Section 263.30(c)(d) [3745-53-20(C)] made?			X	
c) Was the discharge cleaned up as required by Section 263.13 [3745-53-31]?			X	
9. Does the transporter store hazardous waste temporarily while they are in transit?		X		
a) Manifested wastes are stored for 10 days or less ("Transfer Facility") and remain properly DOT-packaged during storage (263.12) [3745-53-12]			X	

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12 [3745-53-12], TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?		X		
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?		X		

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) [3745-53-10(C)] BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262 [3745-52].

REMARKS, TRANSPORTER REQUIREMENTS

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

	Yes	No	N/A	Remark #
Subpart B: General Facility Standards				
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]	X			See notes under generator requirements for concern regarding waste analysis plan.
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]	X			
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]	X			
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	X			
IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				
a) A 24-hour surveillance system, or				Honeywell security system which covers the building on
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	X			Facility fence in
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]	X			

	Yes	No	N/A	Remark #
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	X			
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	X			
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	X			
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	X			
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	X			
b) Physical separation of incompatible waste materials.			X	Acids and organics handled at different sides of facility
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	X			
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	X			Compatability test performed prior to blending See waste analysis plan.

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]	X	—	—	Fire from bottom of reboiler, put out by plant pers... Report in draft for... Incident recorded in... 10-20-88
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	X	—	—	Fire alarm pulls out PA syst...
b) Access to telephone, radio or other device for summoning emergency assistance.	X	—	—	—
c) Portable fire control equipment.	X	—	—	—
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	X	—	—	—
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	X	—	—	—
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	X	—	—	—
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	X	—	—	—
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	X	—	—	—
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]	—	—	X	—

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	X	—	—	—
b) Arrangements or agreements with local or state emergency authorities.	X	—	—	—
c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	X	—	—	—
d) A list of all emergency equipment including location, physical description and outline of capabilities.	X	—	—	—
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]	X	—	—	—
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]	X	—	—	—
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]	X	—	—	—
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	X	—	—	—
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)	X	—	—	Emergency response, district inspector and fire dept notified. Rpt to be submitted

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:				
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]	X			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	X			
c) The estimated (or actual) weight, volume or density of the waste material(s).	X			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	X			
e) The present physical location of each hazardous waste within the facility.	X			
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]				
g) Records of any waste analyses and trial tests required to be performed.				
h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).				
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]				
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.				

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	X			

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)	X			
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]			X	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	X			
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	X			
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]	X			
a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]	X			
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	X			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	X			
d) A description of steps taken to decontaminate facility equipment.	X			
e) The year closure is expected to begin and a schedule for the various phases of closure.	X			
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]			X	No changes in last year.
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]			X	

RCRA INTERIM STATUS INSPECTION FORM

Subpart H: Financial Requirements

Reviewed by Central Office

	Yes	No	N/A	Remark #
1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]				
a) A closure trust fund, or	—	—	—	—
b) A surety bond, or	—	—	—	—
c) A closure letter of credit, or	—	—	—	—
d) A combination of financial mechanisms.	X	—	—	Blind trust fund with irrevocable letter of credit
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?	X	—	—	$113,769
3. When was the most recent estimate made?	—	—	—	December, 1987
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?	—	—	X	—
5. When was the most recent estimate made?	—	—	X	—

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	X	—	—	—
b) In good physical condition (265.171) [3745-66-71]	X	—	—	—
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	X	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	X	—	—	—
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	X	—	—	—
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	X	—	—	—
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	X	—	—	—
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	X	—	—	Acids and organics located in opposite end of the building

Subpart J: Storage in Tanks

	Yes	No	N/A	Remark #
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)].	X			Manual cutoff for coal tanks, feed tank and sludge tank have high level also.
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]			X	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]	X			
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]	X			
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]				
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	X			Compatability test performed see waste anal. plan
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.			X	Process is same for all waste stor. handled

	Yes	No	N/A	Remark #
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265-198(a)) [3745-66-98(A)]				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].			X	
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	X			
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]	X			
8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]			X	
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97)]			X	

8 DECEMBER 87 9:00 A.M. - 5:00 P.M.
Date and Time of Inspection
9 DECEMBER 87 9:00 A.M. - 12:30 P.M.

RCRA INTERIM STATUS INSPECTION FORM

HWFAB # 02-18-0315

GENERAL INFORMATION

U.S. EPA I.D. # OHD 001 426 740

Facility: HUKILL CHEMICAL CORP. Address: 7013 KRICK ROAD City: BEDFORD

State: OHIO Zip Code: 44146 County: CUYAHOGA Telephone: (216) 232-9400

INSPECTION PARTICIPANT(S)

	(Name)	(Title)	(Telephone)
1.	ROBERT HUKILL	PRESIDENT	(216) 232-9400
2.	BOB LANG	PROCESS SUPERVISOR	(216) 232-9400
3.			

INSPECTOR(S)

1.	KRIS L. CODER	ENVIRONMENTAL SCIENTIST	(216) 425-9171
2.	PAUL W. ANDERSON	ENVIRONMENTAL SCIENTIST	(216) 425-9171
3.			

INSTALLATION ACTIVITY

Mark One

- [ ] Generator only (G)
- [ ] Transporter (T)
- [ ] TSDF only
- [ ] G-T
- [ ] G-TSDF
- [ ] T-TSDF
- [X] G-T-TSDF

If the site is a TSDF, check the boxes indicating which areas were reviewed.

- [X] General Facility Standards, Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure
- [X] Containers S01
- [X] Tanks S02/T01
- [ ] Surface Impoundments S04/T02
- [ ] Incineration/Thermal Treatment
- [ ] Waste Piles S03
- [ ] Land Treatment D81
- [ ] Landfills D80
- [ ] Chemical/Physical/ Biological T04
- [ ] Groundwater Monitoring
- [ ] Post-Closure

RCRA INTERIM STATUS INSPECTION FORM

	Yes	No	N/A	Remark #
1. Has the facility submitted a Part A to Ohio?	✓			
2. If "yes", is it complete and accurate?	✓			
3. Has the facility submitted a Part B?	✓			
4. Was advance notice of the inspection given? If so, how far in advance?	✓			3 weeks

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	Yes	No	N/A	Remark #
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]		✓		NEED TO DETERMINE H.W. CHAR. OF PAINT FILTERS.
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?		✓		
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	✓			ELEMENTARY NEUTRALIZATION
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	✓			WHERE APPROPRIATE PROCEDURE NEEDED TO UPDATE MANIFEST.
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	✓			
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	✓			
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	✓			
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	✓			

	Yes	No	N/A	Remark #
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	✓			
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	✓			
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	✓			
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]			✓	
7. If the generator elects to store hazardous waste on-site in containers or tanks for 90 days or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".		✓		PROCESS FEED TANKS SHOULD
b) The date that accumulation began is clearly marked on each container.		✓		BE MARKED AND INDICATE MAX. RESIDENCE TIME.
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	✓			
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	✓			

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 263 (OAC 3745-53) TRANSPORTER REQUIREMENTS

	Yes	No	N/A	Remark #
1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste. [3745-53-11]	✓			PUCO # 304-HW
2. The transporter has accepted hazardous wastes for transport only when the waste was accompanied by a manifest prepared by the generator in accordance with Section 262 [3745-53-20(A)]	✓			
3. The transporter has signed the manifest as required by Section 263.20(b) [3745-53-20(B)] and has carried the manifest with the waste shipment as required by Section 263.20(c) [3745-53-20(C)].	✓			
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) [3745-53-20(D)(1)] and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)) [3745-53-22(A)].	✓			
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21) [3745-53-21(A)(B)].	✓			
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f) [3745-53-20(E)(F)].			✓	
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) [3745-53-22(D)].			✓	
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?		✓		
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)) [3745-53-30(A)]			✓	

	Yes	No	N/A	Remark #
b) Were all of the notifications required by Section 263.30(c)(d) [3745-53-20(C)] made?			✓	
c) Was the discharge cleaned up as required by Section 263.13 [3745-53-31]?			✓	
9. Does the transporter store hazardous waste temporarily while they are in transit?	✓			OFF LOADS? WITHIN 24 HRS.
a) Manifested wastes are stored for 10 days or less ("Transfer Facility") and remain properly DOT-packaged during storage (263.12) [3745-53-12]	✓			

NOTE: TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12 [3745-53-12], TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.

10. Does the transporter import hazardous waste into the United States?			✓	
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?		✓		

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) [3745-53-10(C)] BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262 [3745-52].

REMARKS, TRANSPORTER REQUIREMENTS

RCRA INTERIM STATUS INSPECTION FORM

40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

	Yes	No	N/A	Remark #
Subpart B: General Facility Standards				
1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]	✓			
2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]	✓			AS PART OF CURRENT PART B APPLICATION
3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]	✓			
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	✓			
IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
4. The facility has -				HONEYWELL SYSTEM
a) A 24-hour surveillance system, or	✓			
b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	✓			
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]	✓			

	Yes	No	N/A	Remark #
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]		✓		NEED A MORE EFFECTIVE SYSTEM TO DOCUMENT COMPLETION OF REMEDIAL ACTIONS TAKEN
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	✓			EQUIPMENT MALFUNCTIONS AND PROBLEMS FOUND DURING INSPECTIONS.
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	✓			
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	✓			
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	✓			
b) Physical separation of incompatible waste materials.	✓			
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	✓			
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	✓			

Subpart C: Preparedness and Prevention

	Yes	No	N/A	Remark #
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]		✓		
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				BELL SYSTEM & VOICE PAGE SYSTEM
a) Internal alarm system.	✓			
b) Access to telephone, radio or other device for summoning emergency assistance.	✓			
c) Portable fire control equipment.	✓			
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	✓			
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	✓			HONEYWELL SYSTEM
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	✓			
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	✓			
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	✓			
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]		✓		

Subpart D: Contingency and Emergency

	Yes	No	N/A	Remark #
1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:				
a) Actions to be taken by personnel in the event of an emergency incident.	✓			
b) Arrangements or agreements with local or state emergency authorities.	✓			
c) Names, addresses (Home) and telephone numbers of all persons qualified to act as emergency coordinator.		✓		NEEDS REVISED
d) A list of all emergency equipment including location, physical description and outline of capabilities.		✓		NEED TO ADD HONEY-WELL SYSTEM & OTHER SAFETY EQUIPMENT AS DISCUSSED.
e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]	✓			
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]		✓		
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]		✓		
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	✓			BECKER SYST. AND HONEY-WELL WOULD
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)]			✓	CALL COORDINATORS. (24 HR. #)

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:				
a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]	✓			
b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	✓			
c) The estimated (or actual) weight, volume or density of the waste material(s).	✓			
d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	✓			
e) The present physical location of each hazardous waste within the facility.	✓			
f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]			✓	
g) Records of any waste analyses and trial tests required to be performed.	✓			
h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).	✓			
i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]			✓	
j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.	✓			

	Yes	No	N/A	Remark #
2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	✓			

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)	✓			
a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]			✓	
b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	✓			
4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]	✓			
5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]			✓	

Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

	Yes	No	N/A	Remark #
1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]	✓			
a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]	✓			
b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.	✓			
c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)	✓			
d) A description of steps taken to decontaminate facility equipment.	✓			
e) The year closure is expected to begin and a schedule for the various phases of closure.	✓			
2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]			✓	
3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]			✓	

RCRA INTERIM STATUS INSPECTION FORM

Subpart H: Financial Requirements

	Yes	No	N/A	Remark #
1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]				
a) A closure trust fund, or	✓			
b) A surety bond, or				
c) A closure letter of credit, or	✓			$130,000
d) A combination of financial mechanisms.				
2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?	✓			$113 769
3. When was the most recent estimate made?				DEC, 1987
4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?			✓	
5. When was the most recent estimate made?			✓	

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

CURRENTLY, FACILITY IS UNDER FCO'S TO OBTAIN APPROPRIATE LIABILITY INSURANCE. ORDERS ISSUED HAVE BEEN APPEALED BEFORE THE EBR.

RCRA INTERIM STATUS INSPECTION FORM

Subpart I: Management of Containers

	Yes	No	N/A	Remark #
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	✓			
b) In good physical condition (265.171) [3745-66-71]	✓			
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	✓			
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	✓			
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	✓			
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	✓			
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	✓			
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	✓			

RCRA INTERIM STATUS INSPECTION FORM

Subpart J: Storage in Tanks

	Yes	No	N/A	Remark #
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)].	✓			MANUAL SYSTEM — GUAGE + HIGH LEVEL ALARM SYSTEM
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]			✓	
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]	✓			
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]	✓			
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]				
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.			✓	
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.			✓	

	Yes	No	N/A	Remark #
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265-198(a)) [3745-66-98(A)]				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].	—	—	✓	—
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	✓	—	—	—
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]	✓	—	—	—
8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]	—	—	✓	—
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97)]	✓	—	—	—